

ORIGINAL

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U.S. DISTRICT COURT
DISTRICT OF WYOMING

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Betty A. Griess, Clerk
Casper

Kelly H. Rankin
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District of Wyoming
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

Criminal No. 05-CR-8-D

STEVEN ARTHUR WINSOR,)

Defendant.)

STATEMENT OF ELEMENTS

**COUNT 1: Conspiracy to Possess with Intent to Distribute,
and to Distribute, Methamphetamine**

In order to prove a violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B) and 846, the United States must prove beyond a reasonable doubt each of the following elements:

1. From on or between January 1, 2001, and January 1, 2004;
2. In the District of Wyoming and elsewhere;

3. The Defendant, Steven Arthur Winsor, and at least one other person agreed to violate the drug trafficking laws of the United States, to-wit: possession with the intent to distribute, and to distribute, in excess of 50 grams of methamphetamine;
4. The Defendant knew the essential objectives of the conspiracy;
5. The Defendant knowingly and voluntarily joined the conspiracy; and
6. The coconspirators were interdependent.

This is a Class "B" felony punishable from 5-40 years imprisonment, a fine of up to \$2,000,000, a period of 4 years of supervised release, and a \$100 special assessment fee.

COUNT 2: Felon in Possession of a Firearm

In order to prove a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), the United States must prove beyond a reasonable doubt each of the following elements:

1. From on or between June 1, 2001, through and including June 20, 2003;
2. In the District of Wyoming;
3. The Defendant, Steven Arthur Winsor;
4. Having previously been convicted of a crime punishable by imprisonment for a term exceeding one year;
5. Knowingly possessed firearm(s) which had previously traveled in and affected interstate commerce.


This is a Class "C" felony punishable from 0-10 years imprisonment, a fine of up to \$250,000, a period of 3 years of supervised release, and a \$100 special assessment fee.

DATED this 1st day of February, 2005.

Respectfully submitted,

MATTHEW H. MEAD
United States Attorney

By:


KELLY H. RANKIN
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on this 1st day of February, 2005, I served a true and correct copy of the foregoing **Statement of Elements** upon the following via hand delivery, and by depositing the same, postage prepaid, in the United States mail, addressed to:

Donald L. Tolin
Attorney at Law
P.O. Box 50007
Casper, WY 82605-0007

Counsel for the Defendant, Steven Arthur Winsor

UNITED STATES ATTORNEY'S OFFICE